



August 17, 2016

Alexandra Liverman
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

Re: Responses to DEQ Comments on the NW Natural Gasco Site *Final Stormwater Source Control Data Summary Report*

Dear Alex:

Thank you for your July 14, 2016 letter, which provided Oregon Department of Environmental Quality (DEQ) feedback on the September 2010 *Final Stormwater Source Control Data Summary Report* (Data Summary Report) for the NW Natural Gasco Site. The Data Summary Report was the product of a series of DEQ-approved work plans and investigations extending back to 2006 and was prepared in accordance with DEQ's *Guidance for Evaluating the Stormwater Pathway at Upland Sites*.

We understand that DEQ would like to make a determination with respect to stormwater source control at the Gasco Site prior to the U.S. Environmental Protection Agency issuance of a Record of Decision for the Portland Harbor Superfund Site, which is scheduled to occur at the end of this year. We strongly believe that DEQ can make that determination based on work that has been conducted to date, along with supplemental information NW Natural plans to provide in response to DEQ's July 14, 2016 letter. That supplemental information will include the following:

- A compilation of discharge monitoring data for other permitted tenant discharges
- A description of the drainage basins associated with the two small outfalls near the fuel dock (WR-285 and WR-467)
- A description of current and anticipated site operations and reconfiguration activities
- A description and data compilation for the newly installed outfall that discharges treated groundwater from the hydraulic containment area
- An updated screening assessment of Gasco stormwater quality based on comparisons with Joint Source Control Strategy (JSCS) screening levels and typical stormwater concentrations from comparable land uses

Additional data collection to support stormwater evaluations outside of the Upland Feasibility Study (FS) process is not proposed for the following reasons:

- NW Natural believes that the data already provided, supplemented by information that will be provided, are sufficient to make a determination.
- The data collection DEQ requested cannot be initiated before late fall 2016 and cannot be completed before late spring 2017, presuming qualifying storm events and saturated conditions occur over the next year. Additional data collection will delay DEQ's source control determination target decision date by at least a year.
- Koppers, Inc. (KI), provided notice of termination of lease to NW Natural at the end of June 2016. Decommissioning planning and related activities in that lease area are now underway, and reconfiguration of that lease area is currently expected to take about a year. Therefore, data collection within this lease area that occurs in the coming months would only serve to characterize an area that is undergoing substantial change and would not be representative of the final site condition, nor would it be appropriate for use in a source control determination.
- KI decommissioning activities and the resulting configuration of that lease area may affect stormwater conditions within adjacent areas of the site, which may also affect the representativeness of data collected in those adjacent areas for use in a source control determination.
- NW Natural expects that stormwater conveyance over the entire site will be reconfigured as part of the Upland FS process. Therefore, the planning and design of appropriate stormwater source control measures should be closely integrated with the Upland FS process, whereas any sampling or planning activities conducted in advance of the Upland FS are at risk of becoming immediately outdated and irrelevant.

NW Natural noted that the Data Summary Report states that a number of chemicals exceed JSCS screening values for stormwater at Gasco, which is not unexpected given the conservatively low levels for many of these screening values. Although screening level exceedances do not necessarily indicate an ongoing risk of sediment recontamination to the river, NW Natural nevertheless agrees that additional stormwater source control measures will be considered as a component of the upland remedy. NW Natural continues to propose, as it did in the Data Summary Report, that further control of stormwater be evaluated as part of the Upland FS and be part of any comprehensive alternative considered in the FS. The work plan for the Upland FS is currently under review by DEQ, and the current project working schedule shows the draft Upland FS being submitted for DEQ review in December 2017.

Alex, I hope this information is helpful. I have asked Ben Hung with Anchor QEA to contact you to schedule a meeting to discuss DEQ's comments, NW Natural's response, and specifically, the contents of and timing for the development and submittal of supplemental information that enables DEQ to provide a stormwater source control determination before the end of this year.

Sincerely,



Bob Wyatt
NW Natural

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